

April 11, 2023

Ms. Anna Romanovsky
U.S. Environmental Protection Agency
Document Processing Desk (GDCI-056003-1890)
Office of Pesticide Programs
1200 Pennsylvania Avenue, NW
Washington, DC 20004

RE: GDCI-056003-1890, Potassium 1-naphthaleneacetate (PC No. 056003)
Fine Agrochemicals Ltd (Co. No. 62097)

Dear Ms. Romanovsky,

This letter serves to address the data requirements for the above-identified GDCI. Specifically, those generic data requirements for which Fine Agrochemicals Ltd (Fine) is responding with Option 6, Citing Existing Studies and Option 3, Offer to Pay (for data requirement 860.1340).

EPA Product Registration Number(s)	
62097-36	I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."
Guideline Requirement Number(s)	
Guideline Requirement Number - 850.1400	
Study Title	Fish early-life stage toxicity test
Protocol	N
Use Pattern	C,A
Test Substance	TGAI
Time Frame	12
Footnote(s)	<p>5 Required for freshwater species.</p> <p>10 This case, 1-Naphthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-naphthalene acetamide (PC code 056001), 1-naphthalene acetic acid (056002), potassium 1-naphthalene acetate (naphthalene acetic acid, potassium salt; 056003), ammonium 1-naphthalene acetate (naphthalene acetic acid, ammonium salt, 056004), sodium 1-naphthalene acetate (naphthalene acetic acid, sodium salt, 056007), and ethyl 1-naphthalene acetate (naphthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.</p>



Registrant Response	Citing Existing Study
MRID Number(s)	50754601
EPA's classification	Acceptable
Guideline Requirement Number - 835.1230	
Study Title	Sediment and soil absorption/desorption for parent and degradates
Protocol	N
Use Pattern	C,A
Test Substance	TGAI
Time Frame	24
Footnote(s)	10 This case, 1-Napthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-napthalene acetamide (PC code 056001), 1-napthalene acetic acid (056002), potassium 1-napthalene acetate (napthalene acetic acid, potassium salt; 056003), ammonium 1-napthalene acetate (napthalene acetic acid, ammonium salt, 056004), sodium 1-napthalene acetate (napthalene acetic acid, sodium salt, 056007), and ethyl 1-napthalene acetate (napthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.
Registrant Response	Citing Existing Study
MRID Number(s)	50753501 and 50716401
EPA's classification	50753501- not specified 50716401-Supplemental.
Guideline Requirement Number - 835.4100	
Study Title	Aerobic soil metabolism
Protocol	N
Use Pattern	C,A
Test Substance	TGAI
Time Frame	24
Footnote(s)	10 This case, 1-Napthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-napthalene acetamide (PC code 056001), 1-napthalene acetic acid (056002), potassium 1-napthalene acetate (napthalene acetic acid, potassium salt; 056003), ammonium 1-napthalene acetate (napthalene acetic acid, ammonium salt, 056004), sodium 1-napthalene acetate (napthalene acetic acid, sodium salt, 056007), and ethyl 1-napthalene acetate (napthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.
Registrant Response	Citing Existing Study
MRID Number(s)	50716402
EPA's classification	Acceptable.
Guideline Requirement Number - 850.1010	



Study Title	Aquatic invertebrate acute toxicity, test, freshwater daphnids
Protocol	N
Use Pattern	C,A
Test Substance	TGAI
Time Frame	12
Footnote(s)	10 This case, 1-Napthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-napthalene acetamide (PC code 056001), 1-napthalene acetic acid (056002), potassium 1-napthalene acetate (napthalene acetic acid, potassium salt; 056003), ammonium 1-napthalene acetate (napthalene acetic acid, ammonium salt, 056004), sodium 1-napthalene acetate (napthalene acetic acid, sodium salt, 056007), and ethyl 1-napthalene acetate (napthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.
Registrant Response	Citing Existing Study
MRID Number(s)	82526 and 42470801
EPA's classification	MRID 42470801- Acceptable MRID 82526 - Supplemental
Guideline Requirement Number - 850.1035	
Study Title	Mysid acute toxicity test
Protocol	N
Use Pattern	C,A
Test Substance	TGAI
Time Frame	12
Footnote(s)	10 This case, 1-Napthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-napthalene acetamide (PC code 056001), 1-napthalene acetic acid (056002), potassium 1-napthalene acetate (napthalene acetic acid, potassium salt; 056003), ammonium 1-napthalene acetate (napthalene acetic acid, ammonium salt, 056004), sodium 1-napthalene acetate (napthalene acetic acid, sodium salt, 056007), and ethyl 1-napthalene acetate (napthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.
Registrant Response	Citing Existing Study
MRID Number(s)	50624103
EPA's classification	Acceptable
Guideline Requirement Number - 850.1075	
Study Title	Fish acute toxicity, test, freshwater and marine
Protocol	N
Use Pattern	C,A
Test Substance	TGAI
Time Frame	12



Footnote(s)	4 Required only for estuarine/marine species. 10 This case, 1-Napthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-napthalene acetamide (PC code 056001), 1-napthalene acetic acid (056002), potassium 1-napthalene acetate (napthalene acetic acid, potassium salt; 056003), ammonium 1-napthalene acetate (napthalene acetic acid, ammonium salt, 056004), sodium 1-napthalene acetate (napthalene acetic acid, sodium salt, 056007), and ethyl 1-napthalene acetate (napthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.
Registrant Response	Citing Existing Study
MRID Number(s)	50602101
EPA's classification	Acceptable
Guideline Requirement Number - 850.1300	
Study Title	Daphnid chronic toxicity test
Protocol	N
Use Pattern	C,A
Test Substance	TGAI
Time Frame	12
Footnote(s)	10 This case, 1-Napthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-napthalene acetamide (PC code 056001), 1-napthalene acetic acid (056002), potassium 1-napthalene acetate (napthalene acetic acid, potassium salt; 056003), ammonium 1-napthalene acetate (napthalene acetic acid, ammonium salt, 056004), sodium 1-napthalene acetate (napthalene acetic acid, sodium salt, 056007), and ethyl 1-napthalene acetate (napthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.
Registrant Response	Citing Existing Study
MRID Number(s)	50311901
EPA's classification	Acceptable
Guideline Requirement Number - 850.4500	
Study Title	Algal Toxicity
Protocol	N
Use Pattern	C,A
Test Substance	TGAI
Time Frame	12
Footnote(s)	6 Required for freshwater and estuarine/marine diatom. 10 This case, 1-Napthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-napthalene acetamide (PC code 056001), 1-napthalene acetic acid (056002), potassium 1-napthalene acetate (napthalene acetic acid, potassium salt; 056003), ammonium 1-napthalene acetate (napthalene acetic acid, ammonium salt, 056004), sodium 1-napthalene acetate (napthalene acetic acid, sodium salt, 056007), and ethyl 1-napthalene acetate (napthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other

	active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.
Registrant Response	Citing Existing Study
MRID Number(s)	50636701 and 50636702
EPA's classification	MRID 50636701 and 50636702-Acceptable
Guideline Requirement Number - 850.4550	
Study Title	Cyanobacteria (<i>Anabaena flos-aquae</i>) toxicity
Protocol	N
Use Pattern	C,A
Test Substance	TGAI
Time Frame	12
Footnote(s)	10 This case, 1-Naphthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-naphthalene acetamide (PC code 056001), 1-naphthalene acetic acid (056002), potassium 1-naphthalene acetate (naphthalene acetic acid, potassium salt; 056003), ammonium 1-naphthalene acetate (naphthalene acetic acid, ammonium salt, 056004), sodium 1-naphthalene acetate (naphthalene acetic acid, sodium salt, 056007), and ethyl 1-naphthalene acetate (naphthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.
Registrant Response	Citing Existing Study
MRID Number(s)	50602102
EPA's classification	MRID 50602102-Acceptable
Guideline Requirement Number - 850.6100	
Study Title	Environmental Chemistry Methods and Associated Independent Laboratory Validation
Protocol	N
Use Pattern	C,A
Test Substance	TGAI
Time Frame	12
Footnote(s)	9 ECM/ILV required for water. 10 This case, 1-Naphthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-naphthalene acetamide (PC code 056001), 1-naphthalene acetic acid (056002), potassium 1-naphthalene acetate (naphthalene acetic acid, potassium salt; 056003), ammonium 1-naphthalene acetate (naphthalene acetic acid, ammonium salt, 056004), sodium 1-naphthalene acetate (naphthalene acetic acid, sodium salt, 056007), and ethyl 1-naphthalene acetate (naphthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.
Registrant Response	Citing Existing Study
MRID Number(s)	50157301 and 50312001
EPA's classification	MRID 50157301 and 50312001-studies were evaluated by EPA, but the classification was not specified.

Guideline Requirement Number - 860.1340	
Study Title	Residue analytical method
Protocol	N
Use Pattern	C,A
Test Substance	ROC
Time Frame	24
Footnote(s)	10 This case, 1-Napthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-napthalene acetamide (PC code 056001), 1-napthalene acetic acid (056002), potassium 1-napthalene acetate (napthalene acetic acid, potassium salt; 056003), ammonium 1-napthalene acetate (napthalene acetic acid, ammonium salt, 056004), sodium 1-napthalene acetate (napthalene acetic acid, sodium salt, 056007), and ethyl 1-napthalene acetate (napthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.
Registrant Response	Citing Existing Study Offers to Cost Share (the method determining the NAA conjugates)
MRID Number(s)	44555403, 44586502 and 50319602
EPA's classification	MRID 44555403, 44586502- acceptable MRID 50319602- acceptable, suitable for determination of free acid residues.
Guideline Requirement Number – 860.1380	
Study Title	Storage stability data
Protocol	N
Use Pattern	C,A
Test Substance	ROC
Time Frame	24
Footnote(s)	10 This case, 1-Napthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-napthalene acetamide (PC code 056001), 1-napthalene acetic acid (056002), potassium 1-napthalene acetate (napthalene acetic acid, potassium salt; 056003), ammonium 1-napthalene acetate (napthalene acetic acid, ammonium salt, 056004), sodium 1-napthalene acetate (napthalene acetic acid, sodium salt, 056007), and ethyl 1-napthalene acetate (napthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.
Registrant Response	Citing Existing Study
MRID Number(s)	44660201, 44660202, 44835301, 50827801, 50319603, and 50874301
EPA's classification	MRID 44660201, 44660202, 44835301, 50827801, 50319603, and 50874301-Acceptable
Guideline Requirement Number – 860.1520	



Study Title	Processed food/feed (CITRUS)
Protocol	N
Use Pattern	C,A
Test Substance	TEP
Time Frame	24
Footnote(s)	10 This case, 1-Napthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-napthalene acetamide (PC code 056001), 1-napthalene acetic acid (056002), potassium 1-napthalene acetate (napthalene acetic acid, potassium salt; 056003), ammonium 1-napthalene acetate (napthalene acetic acid, ammonium salt, 056004), sodium 1-napthalene acetate (napthalene acetic acid, sodium salt, 056007), and ethyl 1-napthalene acetate (napthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.
Registrant Response	Citing Existing Study
MRID Number(s)	50411301
EPA's classification	Acceptable
Guideline Requirement Number – 870.3700	
Study Title	Prenatal developmental toxicity study
Protocol	N
Use Pattern	C,A
Test Substance	TEP
Time Frame	24
Footnote(s)*	7 Studies should be conducted with both a rat and rabbit. 10 This case, 1-Napthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-napthalene acetamide (PC code 056001), 1-napthalene acetic acid (056002), potassium 1-napthalene acetate (napthalene acetic acid, potassium salt; 056003), ammonium 1-napthalene acetate (napthalene acetic acid, ammonium salt, 056004), sodium 1-napthalene acetate (napthalene acetic acid, sodium salt, 056007), and ethyl 1-napthalene acetate (napthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.
Registrant Response	Citing Existing Study
MRID Number(s)	00042765 (rat), 46685803 (rat), 00137821 (rabbit), 00137822(rabbit) and 46685801 (rabbit)
EPA's classification	MRID 00042765 (rat), 46685803 (rat), 00137821 (rabbit), 00137822(rabbit) and 46685801 (rabbit)- Acceptable
Guideline Requirement Number – 870.4200	
Study Title	Carcinogenicity
Protocol	N
Use Pattern	C,A



Test Substance	TGAI
Time Frame	48
Footnote(s)	<p>10 This case, 1-Napthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-napthalene acetamide (PC code 056001), 1-napthalene acetic acid (056002), potassium 1-napthalene acetate (napthalene acetic acid, potassium salt; 056003), ammonium 1-napthalene acetate (napthalene acetic acid, ammonium salt, 056004), sodium 1-napthalene acetate (napthalene acetic acid, sodium salt, 056007), and ethyl 1-napthalene acetate (napthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.</p> <p>11 Studies should be conducted with both rats and mice.</p>
Registrant Response	Citing Existing Study
MRID Number(s)	44157501 (rat), 46685802 (mice), 49169901 (mice) and 49196501 (mice), NCI study (Innes et al 1969)*
EPA's classification	44157501 (rat), 46685802 (mice), NCI study (Innes et al 1969)- Acceptable MRID 49169901 (mice) and 49196501 (mice)- unknown
Guideline Requirement Number – SS-1311	
Study Title	Honey bee adult acute oral toxicity
Protocol	N
Use Pattern	C,A
Test Substance	TGAI
Time Frame	12
Footnote(s)	<p>1 Tier 1 study. See the OECD Test Guideline</p> <p>8 For additional information regarding study design elements for the honey bee toxicity studies, please refer to USEPA. 2016. Guidance on Exposure and Effects Testing for Assessing Risks to Bees. Office of Pesticide Programs. U.S. EPA, July 5, 2016. See: https://www.epa.gov/sites/default/files/2016-07/documents/guidance-exposure-effects-testing-assessingrisks-bees.pdf. Also see: USEPA 2018. Honey Bee Toxicity Testing Frequently Asked Questions, August 16, 2018. See https://www.epa.gov/sites/default/files/2018-08/documents/pollinator-faq.pdf</p> <p>10 This case, 1-Napthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-napthalene acetamide (PC code 056001), 1-napthalene acetic acid (056002), potassium 1-napthalene acetate (napthalene acetic acid, potassium salt; 056003), ammonium 1-napthalene acetate (napthalene acetic acid, ammonium salt, 056004), sodium 1-napthalene acetate (napthalene acetic acid, sodium salt, 056007), and ethyl 1-napthalene acetate (napthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.</p>
Registrant Response	Citing Existing Study
MRID Number(s)	49942102
EPA's classification	Acceptable
Guideline Requirement Number – SS-1313	



Study Title	Honey bee adult chronic oral toxicity
Protocol	N
Use Pattern	C,A
Test Substance	TGAI
Time Frame	12
Footnote(s)	<p>2 Tier 1 study. OECD Test Guideline 245 (OECD. 2017, Honey Bee (Apis mellifera L.) Chronic Oral Toxicity Test (10-day feeding). See https://www.oecd-library.org/environment/test-no-245-honey-bee-apis-mellifera-chronic-oral-toxicity-test-10-day-feeding_9789264284081-en</p> <p>8 For additional information regarding study design elements for the honey bee toxicity studies, please refer to USEPA. 2016. Guidance on Exposure and Effects Testing for Assessing Risks to Bees. Office of Pesticide Programs. U.S. EPA, July 5, 2016. See: https://www.epa.gov/sites/default/files/2016-07/documents/guidance-exposure-effects-testing-assessingrisks-bees.pdf. Also see: USEPA 2018. Honey Bee Toxicity Testing Frequently Asked Questions, August 16, 2018. See https://www.epa.gov/sites/default/files/2018-08/documents/pollinator-faq.pdf</p> <p>10 This case, 1-Napthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-napthalene acetamide (PC code 056001), 1-napthalene acetic acid (056002), potassium 1-napthalene acetate (napthalene acetic acid, potassium salt; 056003), ammonium 1-napthalene acetate (napthalene acetic acid, ammonium salt, 056004), sodium 1-napthalene acetate (napthalene acetic acid, sodium salt, 056007), and ethyl 1-napthalene acetate (napthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.</p>
Registrant Response	Citing Existing Study
MRID Number(s)	50954401
EPA's classification	Submitted to EPA, but not evaluated yet.
Guideline Requirement Number – SS-1314	
Study Title	Honey bee larvae chronic oral toxicity
Protocol	N
Use Pattern	C,A
Test Substance	TGAI
Time Frame	12
Footnote(s)	<p>3 Tier 1 study. OECD Guidance document 239. OECD 2021. Guidance Document on Honey Bee (Apis mellifera L.) Larval Toxicity Test, Repeated Exposure. See: https://one.oecd.org/document/ENV/JM/MONO(2016)34/en/pdf</p> <p>8 For additional information regarding study design elements for the honey bee toxicity studies, please refer to USEPA. 2016. Guidance on Exposure and Effects Testing for Assessing Risks to Bees. Office of Pesticide Programs. U.S. EPA, July 5, 2016. See: https://www.epa.gov/sites/default/files/2016-07/documents/guidance-exposure-effects-testing-assessingrisks-bees.pdf. Also see: USEPA 2018. Honey Bee Toxicity Testing Frequently Asked Questions, August 16, 2018. See https://www.epa.gov/sites/default/files/2018-08/documents/pollinator-faq.pdf</p> <p>10 This case, 1-Napthaleneacetic acid, its salts, ester, and acetamide (NAA, case number 0379) includes the following six active ingredients: 1-napthalene acetamide (PC code 056001), 1-napthalene acetic acid (056002), potassium 1-napthalene acetate (napthalene acetic acid, potassium salt; 056003), ammonium 1-napthalene acetate (napthalene acetic acid, ammonium salt, 056004), sodium 1-napthalene acetate (napthalene acetic acid, sodium salt, 056007), and ethyl 1-napthalene acetate (napthalene acetic acid, ethyl ester, 056008). Generally, a study generated with a test substance of one active ingredient supports the other active ingredients in</p>

	the case. Based on the Ecological Draft Risk Assessment (DRA), the ethyl ester may be more toxic to certain taxa. Therefore, studies for the ethyl ester can be used to represent the other active ingredients and/or group of related active ingredients, but studies for the other active ingredients cannot be used to represent the ethyl ester alone.
Registrant Response	Citing Existing Study
MRID Number(s)	50716302
EPA's classification	Acceptable

*Innes JR, Ulland BM, Valerio MG, Petrucelli L, Fishbein L, Hart ER, Pallotta AJ, Bates RR, Falk HL, Gart JJ, Klein M, Mitchell I, Peters J. 1969. Bioassay of pesticides and industrial chemicals for tumorigenicity in mice: a preliminary note. Journal of the National Cancer Institute. 42: 10010-1114.

To addition to DCI response cover letter, following documents submitted:

- Certification with Respect to Citations of Data, EPA Form 8570-34
- Data Matrix, EPA form 8750-35
- Certification of Offer to Cost Share in the Development of Data, Form 8570-32
- Offer to pay letter sent to AMVAC Chemical Corporation
- Data Call-in Response, EPA form 6300-4
- Requirements Status and Registrant's Response, EPA form 6300-3
- Proof of the other registrant's receipt of the offer

If you have any questions, please do not hesitated to contact me (jolantao@fine-america.com).

Sincerely,


Jolanta Ozatalay
Regulatory Affairs Project Manager

Enclosures

